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LETTER AND COMMENTS FROM ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
REGARDING DRAFT REMEDIAL INVESTIGATION REPORT SITE 9 CAMP MOFFETT  
DISPOSAL AREA NS GREAT LAKES IL  
1/28/2013  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

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January 28, 2013

NAVFAC Midwest IPT EV  
Attn: Ms. Terese Van Donsel  
Building 1A  
201 Decatur Avenue  
Great Lakes, Illinois 60088-2801

Re: Draft Remedial Investigation Report for  
the Site 9 – Camp Moffett Disposal Area  
Naval Station Great Lakes  
Great Lakes, Illinois

0971255048 – Lake  
Great Lakes Naval Station  
Superfund/Technical

Dear Ms. Van Donsel:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's additional responses to Agency comments regarding the Revised Draft Remedial Investigation Report for the Site 9 – Camp Moffett Disposal Area, Naval Station Great Lakes, Great Lakes, Illinois. They were submitted via electronic mail and were received January 17, 2013. Accompanying those responses was a redline-strikeout version of the revised text of the Remedial Investigation Report. The Remedial Investigation Report presents the results of the September and November 2009 environmental investigation of Site 9 and the subsequent human health risk assessment for the site. The Agency has conducted a review of the Navy's responses and provides the following comments.

- 1) **Response to Comment Nos. 1-31, 33, and the second General Comment** – The response is acceptable.
- 2) **Response to Comment No. 32** – The Navy and Illinois EPA have discussed this comment in depth. The Agency understands the Navy's reluctance to continue this investigation off-site. However, the nature *and extent* of all identified contamination must be properly delineated before a final risk assessment can be conducted and the appropriate range of remedial alternatives determined. The full extent of the contamination, for both soil and groundwater, cannot be ascertained without obtaining samples in the down-gradient direction within the former ravine. That portion of the ravine, which only extends off-site to the road cut for Highway 137 (approximately 400 feet), is not currently owned by the Navy. The Agency

realizes that obtaining the right-of-entry to collect those samples may or may not be possible, but an attempt should be made, none the less.

- 3) **1<sup>st</sup> General Comment** – Illinois EPA acknowledges the unnecessary protectiveness provided when using chronic toxicity values for subchronic applications. Our goal is to minimize the distortion of risks and hazards at a site so as to provide realistic and comparable results. The response is acceptable with the provision of adding text in the uncertainty section of the report similar to the language promised for our Table 6-9 comment. Additionally, the consequences of using chronic toxicity values should be qualified in tabular form similar to the added Appendix G, Uncertainty Table 1. Although not included in the current response to comments, the over-protectiveness of using the Vanadium Pentoxide reference concentration as a surrogate for Vanadium and Compounds should also be included in these analyses.

If you have any questions regarding anything in this letter or require any additional information, please contact me at (217) 557-8155 or via electronic mail at [brian.conrath@illinois.gov](mailto:brian.conrath@illinois.gov).

In accordance with Public Act 96-0603, which went into effect on August 24, 2009, any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

Sincerely,

*Brian A. Conrath*

Brian A. Conrath  
Remedial Project Manager  
Federal Facilities Unit  
Federal Site Remediation Section  
Bureau of Land

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cc: Bob Davis, Tetra Tech NUS, Inc.

Owen Thompson, USEPA (SR-6J)